



SDMS DocID 2001274



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08/28/2002 12:52 PM

To: Carlyn Prisk/R3/USEPA/US@EPA
cc: "'Donald M LTC Taylor (99TH RSC)
(Donald.Taylor2@usarc-emh2.army.mil)'"
<Donald.Taylor2@usarc-emh2.army.mil>, "Love, John Mr
(OCAR-JonesTechInc CONTR)"
<John.Love.JonesTechInc@ocar.army.pentagon.mil>, "Harney, David
P LTC LITCTR" <HarneyDP@hqda.army.mil>
Subject: RE: Status of Army's Search Efforts - Lower Darby Creek Superfund
Site

Ms. Prisk -

We will mail the Army Reserves' response to the § 104(e) Request for Information to your office today. Our response is packaged in a three ring binder which contains a cover letter, our narrative responses to the questionnaire plus source documents. I have attached our narrative response and the table of contents to the binder for your convenience. When you see the cover letter, you will note that we contemplate providing additional response once we receive the results of additional record searches by the Corps of Engineers in New York and a reserve command in New Jersey.

Please contact me if you have any questions.

LTC David P. Harney
Environmental Law Division
901 N. Stuart Street, Suite 400
Arlington, VA 22204
(703)-696-1596/FAX 2940

-----Original Message-----

From: Harney, David P LTC LITCTR
Sent: Wednesday, August 21, 2002 12:35 PM
To: 'Prisk.Carlyn@epamail.epa.gov'
Cc: 'Donald M LTC Taylor (99TH RSC) (Donald.Taylor2@usarc-emh2.army.mil)'; Harney, David P LTC LITCTR;
Love, John Mr (OCAR-JonesTechInc CONTR)

Subject: RE: Status of Army's Search Efforts - Lower Darby Creek Superfund Site

Ms. Prisk -

Today, I had a conference call with personnel in the 99th Army Reserve Support Command to review the draft response I have assembled. We identified a few data gaps that needed to be addressed. My intent is to mail a response to your office on 28 August 2002. I will contact you if that changes.

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-----Original Message-----

From: Harney, David P LTC LITCTR

Sent: Friday, July 19, 2002 2:04 PM

To: Harney, David P LTC LITCTR; 'Prisk.Carlyn@epamail.epa.gov'

Cc: 'Donald M LTC Taylor (99TH RSC) (Donald.Taylor2@usarc-emh2.army.mil)'

Subject: RE: Status of Army's Search Efforts - Lower Darby Creek Superfund Site

Ms. Prisk -

The 24 July hearing in my other case was canceled yesterday. I have been collating the information gathered during our investigation. I intend to work on this task next week also and then to circulate that response with personnel in the 99th Reserve Support Command by the end of the week. I will keep you posted on our progress.

LTC David P. Harney

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-----Original Message-----

From: Harney, David P LTC LITCTR

Sent: Wednesday, July 10, 2002 4:48 PM

To: 'Prisk.Carlyn@epamail.epa.gov'

Cc: Donald M LTC Taylor (99TH RSC) (Donald.Taylor2@usarc-emh2.army.mil)

Subject: RE: Status of Army's Search Efforts - Lower Darby Creek Superfund Site

Ms. Prisk -

Thank you for your patience. I have been sidetracked in another case and am in the process of preparing for a court hearing on 24 July. Throughout the Spring and early Summer, my office participated in weekly meetings with the 99th Reserve Support Command, the command responsible for reserve sites in the Pennsylvania area, and the Army Corps of Engineers, which is responsible for many of the old Nike sites. We have collected a significant amount of information. I am still in the process of inserting that data into the 104(e) questionnaire and then intend to circulate that amongst the contributors to ensure we provide an accurate response. If my court date on the 24th of July is canceled - which is quite possible - I will endeavor to provide a response to your office by that date.

LTC David P. Harney

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-----Original Message-----

From: Prisk.Carlyn@epamail.epa.gov [<mailto:Prisk.Carlyn@epamail.epa.gov>]

Sent: Tuesday, July 09, 2002 1:26 PM

To: Harney, David P LTC LITCTR

Subject: Re: Status of Army's Search Efforts - Lower Darby Creek Superfund Site

Lt. Colonel Harney,

Could you please give me an update on the progress of the Army's official response to EPA's Information Request made pursuant to 42 U.S.C. Section 9604(e), CERCLA Section 104(e)? I have had no communication from you in several months and I am quite anxious to receive your response.

Thank you,

Carlyn Winter Prisk, Investigator
PRP Investigation and Site Information Section
Hazardous Site Cleanup Division
U.S. Environmental Protection Agency, Region III
1650 Arch Street (3HS11)
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"Harney, David P LTC LITCTR" <HarneyDP@hqda.army.mil>
To: Carlyn Prisk/R3/USEPA/US@EPA
cc:
Subject: Status of Army's Search Efforts - Lower Darby Creek Superfund Site
03/28/02 12:46 PM

Ms. Prisk:

Here's is a written version of the information that I shared with you earlier today.

1. Our Reserve Component has identified 28 current and former reserve facilities within the Philadelphia area. Twenty-five (23) of those facilities fall within the 5 counties surrounding Philadelphia (Bucks, Chester, Delaware, Montgomery and Philadelphia); the remaining three sites are in New Jersey, located about 20 miles from the Lower Darby Creek Superfund Site.
2. Eleven of the facilities are still active, that is, have some Army Reserve presence. The U.S. Army Reserve Center (USARC) in Bristol is still an active site and was also home to a former Nike Site. Of the 17 inactive facilities, ten are former Nike Sites. For your information, the Nike Sites usually consisted of two parcels of property - one for the missile launchers and once for the command and control element - which were in close proximity, but not necessarily contiguous. Most of the former Nike Sites are considered Formerly Used Defense Sites (FUDS), a program governed by the Corps of Engineers. We have documentation discussing waste management practices at those sites on a programmatic level. We are in the process of reviewing Corps of Engineers records to determine if we have site-specific waste management information.
3. Our Reserve Component has gathered a large volume of information and believes it has accumulated about 99% of the data for the current units and activities and about 75% of that data for the period 1956-1976. Our next meeting is scheduled for Wednesday, April 6th. After that, we will provide a listing of current and past units and activities.
4. Our search efforts have also revealed that several of the former Nike Sites were once under the control of National Guard units. We have enlisted the support of the Office of Chief Counsel for the National Guard Bureau which is seeking relevant information from the Pennsylvania, New Jersey and New York Guard Units that were once involved at those sites.
5. I will continue to provide periodic updates on the status of our search efforts. Thank you for sharing information about the interviews of the waste haulers. Please let me know if you find any other information concerning the Army (either active, reserve or National Guard units).

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104(e) Questionnaire - Table of Contents 104(e) Questionnaire - Answers.(

**Response to Section 104(e), CERCLA, Questionnaire
Lower Darby Creek Superfund Site**

Table of Contents

1. Letter, EPA Region III, 12 December 2001, subj: Required Submission of Information Lower Darby Creek Area Superfund Site – Clearview Landfill, Folcroft Landfill and Folcroft Annex Landfill.
2. Site Information from <http://www.epa.gov/reg3hwmd/super/PA/lower-darby/pad.htm> and http://www.atsdr.cdc.gov/gsql/getchems.script?in_site=PASFN0305521.
3. Army Response to Section 104(e), CERCLA Questionnaire.
4. U.S. Army Toxic and Hazardous Materials Agency, "Historical Overview of the Nike Missile System", December 1984.
5. U.S. Army, Corps of Engineers, Huntsville Division, "Final Report, Investigation of Former Nike Missile Sites For Potential Toxic and Hazardous Waste Contamination," March 1986 (2 vols.).
6. Army Regulation (AR) 5-9, *Intraservice Support, Installation Area Coordination*, 17 May 1974, with Appendix B, Map B-1.
7. Materiel Data Safety Sheets.
8. Tri-County Hauling Invoices and other documents provided by EPA, Region III.
9. Management Improvement Program Report for the Third Quarter of 1956 from Fort Dix
10. AR 340-18-14, *Maintenance and Disposition of Logistics Functional Files*, 14 Aug 1969.
11. AR 340-18-15, *Maintenance and Disposition of Facilities Functional Files*, 14 Aug 1969.
12. AR 345-210, *Records Management File Systems and Standards*, 31 Oct 1962.
13. AR 345-215, *Records Management – TOE Units of the Active Army and the Army Reserve*, 1 Nov 1962.

**Response to Section 104(e), CERCLA, Questionnaire
Lower Darby Creek Superfund Site**

1. What is the current nature of the business or activity conducted at U.S. Army Reserve facilities in the Philadelphia, Pennsylvania area? What was the nature of your business or activity between 1958 and 1976? Please describe in detail. If the nature of your business or activity changed from the period of 1958 to 1976 to the present, please provide a detailed explanation of the changes to date.

Answer.

a. Appendix 1 to this questionnaire contains three tables listing U.S. Army Reserve Facilities that were in active between 1958-1976 (Table 1); that are currently active (Table 2); and that were active between 1976 and 2001 (Table 3). Each table also identifies the activities conducted at those sites during the relevant time frames. We have defined the Philadelphia area to include the five Pennsylvania counties immediately surrounding the city: Bucks, Chester, Delaware, Philadelphia, and Montgomery, and three former Nike Sites in New Jersey because of their proximity (e.g., within a 25 mile radius) to the Lower Darby Creek Superfund Site.

b. **Nike Sites.** Between 1958 and 1976, the Army operated 16 facilities in the Philadelphia area; ten (10) of which were former Nike Sites. The Army deployed Nike Ajax and Nike Hercules guided missiles at sites throughout the continental United States to protect major metropolitan areas and strategic military installations from aerial attack between 1954 and the early 1970s. (TAB 4, p 1-1)¹ These sites were operated by active duty Army units on a full-time basis until about 1962 when responsibility for that mission was gradually transferred to National Guard units. (TAB 4, 2-4). Shortly thereafter, many Nike sites were deactivated and then transferred to GSA for disposition outside the federal government; the last Philadelphia area site, PH 41/43 in Gloucester, New Jersey, was deactivated in 1974.

c. Nike Sites usually consisted of two, non-contiguous parcels of land: a command and control parcel and a launch parcel. Occasionally, a site included a third parcel of land which was used as a housing area. (TAB 4, p 4-1) A typical site included a motor pool, generator building, acid pit, and missile assembly buildings. Nike Sites were capable of assembling, maintaining, and fueling missiles and performing organizational level maintenance (i.e., oil changes, tune-ups, and minor repairs) for support equipment and vehicles. (TAB 4, p 6-5)

d. **Reserve Facilities.** Between 1958 and 1976, the Army Reserves acquired three of the deactivated Nike Sites (Bristol, Edgemont, and North Penn) and conducted operations at another six facilities, unassociated with the former Nike Sites.² The U.S. Army Reserve is part of the Department of Defense and is the active Army's federal reserve force. It is made up of combat support and combat service support forces that give the active Army the resources it needs to deploy overseas and to sustain combat troops during wartime, contingencies or other operations. Presently, reserve forces stationed in the eastern Pennsylvania area primarily include transportation, medical, logistical, and engineer units. Between 1958 and 1976, the reserve forces also included infantry and field artillery units.

¹ Information pertaining to the former Nike sites is based on the following documents: U.S. Army Toxic and Hazardous Materials Agency, "Historical Overview of the Nike Missile System", December 1984 (1 vol.) (TAB 4); and U.S. Army, Corps of Engineers, Huntsville Division, "Final Report, Investigation of Former Nike Missile Sites For Potential Toxic and Hazardous Waste Contamination," March 1986 (2 vols.)(TAB 5).

² Information pertaining to the Army Reserve facilities and activities in the Philadelphia area is based on the Nike Site reports mentioned in footnote 1, unit historical directories and wire diagrams which identified possible points of contact, and interviews of individuals identified in response to question 2.

**Response to Section 104(e), CERCLA, Questionnaire
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e. Typical USAR Centers generally consisted of an administrative facility and sometimes a separate maintenance shop. They were generally located on parcels of land less than 5 acres. Due to a limited construction budget between the 1950s and 1970, few buildings were constructed to house reserve units. The vast majority were structures that often had a prior non-military use. As there was no formal plan or layout for these facilities, site usage parking, equipment storage, and training varied and had to be adopted to local conditions. Equipment storage varied according to type of unit. In general, a unit might keep a number of vehicles such as trucks or jeeps on-site. Combat units might maintain a limited number of tracked vehicles (armored personnel carriers or tanks), but the majority of this type of equipment would be stored off-site at an ECS assessable to a training range.

f. Operations at reserve facilities were fundamentally different than those at the Nike Sites in several regards. The first major difference pertained to manning levels. Historically, reserve units have drilled one weekend a month and conducted annual training, that is, full-time training two weeks during the summer. At all other times, reserve units and facilities are manned by a few full-time individuals, referred to as unit administrators, who handle routine administrative functions. The second major difference pertained to equipment and vehicles. Unlike the Nike Sites, reserve units are not always co-located with most of their equipment and vehicles; instead, these items were stored at equipment concentration sites. These sites are typically located on active duty military installations because they provide continuous physical security and access to suitable maintenance facilities and training areas (e.g., rifle or field artillery ranges, maneuver areas). Reserve units in the Philadelphia area used Fort Indiantown Gap, in Annville, Pennsylvania, to store and maintain their equipment and vehicles. Finally, because of the reduced manning levels within the reserves and in order to achieve economic efficiencies, the Army established an area support program under which designated installations were responsible for providing services necessary to support military units and activities in specified geographic regions. (TAB 6, paragraph 5.a)³ Fort Indiantown Gap, or Indiantown Gap Military Reservation as it was known before it became an active duty post, was designated as the Area Support Coordinating Installation for reserve units throughout Pennsylvania and West Virginia. Fort Dix carried the same responsibilities for units in New Jersey. Under this program, Fort Indiantown Gap was responsible for providing or coordinating with another installation to provide a variety of logistics services including: procurement, property disposal, and equipment and vehicle maintenance. (TAB 6, Appendix B, Map B-1) As a result of the differences noted above, most waste management activities for reserve forces and the creation of documents associated with those activities, occurred at either Fort Indiantown Gap or Fort Dix. During the 1990s, the active duty missions at both installations were terminated under the Base Closure and Realignment statutes. Now, these bases are devoted exclusively to supporting Army National Guard and U.S. Army Reserve Force missions.

³ Army Regulation (AR) 5-9, *Intraservice Support, Installation Area Coordination*, 17 May 1974.

**Response to Section 104(e), CERCLA, Questionnaire
Lower Darby Creek Superfund Site**

2. Identify all person currently or formerly employed by the U.S. Army Reserves who have or may have personal knowledge of your operations and waste disposal practices between 1958 and 1976 at your facilities in the Philadelphia, Pennsylvania area. For each such person, state that person's employer, job title, dates of employment, current address, and telephone number. If the current telephone number or address is not available, provide the last known telephone number or last known address of such person.

Answer.

a. Mr. Cal Bowser, Chief, Maintenance Section, Deputy Chief of Staff for Logistics, 99th Reserve Support Command, 99 Soldier Lane, Moon Township, PA 15108 (412) 604-8377. Served as Heavy Mobile Equipment Repairer & Tools & Parts Specialist at Area Organizational Maintenance Site (AOMS) # 104, Greensburg, PA (99th ARCOM) from Jan 70 to Jul 77; Equipment Specialist at Readiness Group, Oakdale, PA (supporting the 99th ARCOM) from Jul 77 to Aug 80; Heavy Mobile Equipment Repairer Leader at Area Maintenance Support Activity (AMSA) #103, Franklin, PA (99th ARCOM) from Aug 80 to Jul 85; Heavy Mobile Equipment Repairer Supervisor at Equipment Concentration Site #103, Franklin, PA (99th ARCOM) from Jul 85 to Aug 88; Heavy Mobile Equipment Repairer Supervisor at AMSA #106, Punxsutawney, PA (99th ARCOM) from Aug 88 to Aug 90; Supervisory Equipment Specialist, 99th ARCOM, Oakdale, PA from Aug 90 to Oct 95; Supervisory Equipment Specialist 99th Reserve Support Command (RSC), Oakdale, PA from Oct 95 to Sept 97; and Supervisory Maintenance Management Specialist 99th RSC Oakdale/Coraopolis PA from Sept 97 to present. Is generally familiar with waste management practices associated with maintenance activities from 1970 present. Recalls that waste oil was poured on the ground to control weed growth or was transferred to vendors for commercial reasons or to municipalities for dust suppression or to undercoat vehicles. Recalls that solvents such as, Stoddard Solvents, PD-680, methyl ethyl ketone, in 2 to 5 gallon containers were used to clean garage floors and equipment parts. Occasionally waste solvents were poured in drains and waste rags were thrown in the trash for disposal. Recalls that the acid was drained from old batteries into lined pits and then neutralized using baking soda or limestone rock and the battery casing was turned in for recycling. Recalls instances where the battery casing was given to the City of Reading which used shredded casing as fill for road material. Is generally familiar with manning practices of reserve units beginning in mid to late 1960s (16 hours of reserve training was conducted a month usually on one Sunday a month and then two Wednesdays a month). Recalls that most reserve equipment was stored at Fort Indiantown Gap and that most maintenance activities took place there or during annual training.

b. Mr. Raymond Bevan, Supervisor, Equipment Concentration Site #24, Building 10-83, Fort Indiantown Gap, Annville, PA 17003-5015 (717) 861-2165. Served as a mechanic for Area Organization Maintenance Shop (AOMS), Army Reserves, in Reading, Pennsylvania from 1970 to 1978. Served as supervisor of Equipment Concentration Site 24, Fort Indiantown Gap, Pennsylvania from 1978 to the present. Is generally familiar with waste management practices associated with maintenance activities from 1970 to the present. Recalls that some waste oil and filters were placed in dumpsters and hauled as municipal waste or poured in drains or directly on to the ground. Has no recollection whether waste oil was collected for resale or disposal. Recalls that used batteries were shipped to the Naval Shipyard in Philadelphia for disposal. Recalls that full-time manning of reserve centers with administrative staff did not begin until about 1976.

**Response to Section 104(e), CERCLA, Questionnaire
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c. Mr. William Staub, Civilian Executive Officer, 99th Regional Support Command (RSC), 99 Soldier Lane, Moon Township, PA 15108 (412) 604-8002. Served as Civilian Executive Officer from 1985 to 1996 and as a Military Personnel Officer from 1972 to 1985 for the 79th Army Command (ARCOM), Willow Grove, a predecessor organization to the 99th RSC. Is generally familiar with U.S. Army Reserves relying on Fort Indiantown Gap for base operations support, general waste management practices at reserve facilities and reserve manning practices.

d. Walter Wisner, Retired, Facility Management Supervisor, 61 Carriage Drive, Doylestown, PA 18901 (215) 345-4341. Served as a Military Technician in the Army Reserves and had 43 years of Federal Service. In general, he was familiar with Base Operations practices and the support provide by Active Army Installations, the general history of the Philadelphia Nike System and Logistic practices of the 79th ARCOM.

f. Francis E. Huff, Supervisor, Area Maintenance Support Activity #23 Willow Grove, Bldg. 178, NAS Willow Grove, PA 19090 (215) 443-1654.

**Response to Section 104(e), CERCLA, Questionnaire
Lower Darby Creek Superfund Site**

3. Describe the types of documents generated or maintained by your facility(ies) in the Philadelphia, Pennsylvania area concerning the handling and/or generation, storage, treatment, transportation, recycling, formulation, or disposal of any hazardous substance, hazardous waste, pollutant, contaminant or other waste between 1958 and 1976.

Answer. Because of the Army's records retention policies, discussed in response to Question 14, the types of records sought in this question no longer exist. Nonetheless, a review of Army record retention policies, discussed in response to Question #14, that were in existence during the relevant time-frame identify some of the typical documents that would have been generated and maintained.

a. Provide a description of the information included in each type of document and identify the person who was/is the custodian of the documents;

Answer. See previous response.

b. Describe any permits or permit applications and any correspondence between your company and /or establishment(s), and any regulatory agencies regarding the transportation and disposal of such wastes.

Answer. Army Components were not required to apply for permits to treat, store, or dispose of or to use manifests to transport hazardous wastes, hazardous substances, pollutants, contaminants or other wastes prior to the passage of the Resource Conservation and Recovery Act in October 1976 and that statute's implementing regulations thereafter.

c. Describe any contracts or correspondence between your company and/or establishment(s) and any other company or entity regarding the transportation and disposal of such wastes.

Answer. The Army's records retention policy in effect during the relevant time frame required the destruction of contract files after 3 years if the value of the contract was less than \$2,500 or after 6 years if the value exceeded that amount. Because of that policy, we were unable to locate military documents confirming that the Army Reserve contracted or made arrangements with any companies for the transportation and disposal of wastes during the relevant time periods.

**Response to Section 104(e), CERCLA, Questionnaire
Lower Darby Creek Superfund Site**

4. Identify every hazardous substance used, generated, purchased, stored, or otherwise handled at your establishment(s) in the Philadelphia, Pennsylvania area between 1958 and 1976. Provide chemical analyses and Material Safety Data Sheets ("MSDS"). With respect to each such hazardous substance, further identify:

Answer.

a. **Nike Sites.** Hazardous substances used or stored during the operational life of Nike Sites included: liquid missile fuel (JP-4 jet fuel (TAB 4, p 5-5)); solid missile fuel (ammonium perchlorate (TAB 4, p 5-12)), starter fluids (unsymmetrical dimethyl hydrazine, aniline, furfuryl alcohol, (TAB 4, p 5-5)) oxidizer (inhibited red fuming nitric acid (TAB 4, pp 4-4, 7-6)); hydrocarbons (motor oil, hydraulic fluid, diesel fuel, gasoline, heating oil (TAB 4, p 6-5)), solvents (carbon tetrachloride, trichloroethane, trichloroethylene, Stoddard solvent or PD-680, toluene, acetone and alcohol (TAB 4, p 6-5)), polychlorinated biphenyls (TAB 4, p 4-5), ethylene oxide, liquid electrolyte batteries (TAB 4, p 6-9).

b. **Reserve Facilities.** Hazardous substances used or stored during the operation of reserve facilities included: hydrocarbons (motor oil, hydraulic fluid, diesel fuel, gasoline, solvents (carbon tetrachloride, trichloroethane, trichloroethylene, Stoddard solvent or PD-680, toluene, acetone and alcohol, polychlorinated biphenyls, and liquid electrolyte batteries.

Material Safety Data Sheets for these substance are at TAB 7 in alphabetical order.

a. The process(es) in which each hazardous substance was used, generated, purchased, stored, or otherwise handled;

Answer. At Nike Sites, the hazardous substances were used or otherwise handled during the following operations: fueling, missile assembly, maintenance and repair of support equipment, vehicles and facilities, and handling and storage of materiel. At Reserve Facilities, the hazardous substances were used or otherwise handled during maintenance and repair of support equipment, vehicles and facilities, and handling and storage of material.

b. The chemical composition, characteristics, and physical state (solid, liquid, or gas) of each such hazardous substance;

Answer. See attached MSDS. Because of the Army's records retention policies, discussed in response to Question 14, records containing this type of information no longer exist. We believe, however, that most of the hazardous substances were in a liquid form, unless otherwise noted above. This conclusion is based (1) the Nike Site reports mentioned in response to Question 1 and (2) interviews of individuals identified in response to Question 2.

c. The annual quantity of each such hazardous substance used, generated, purchases, stored, or otherwise handled;

Answer. Because of the Army's records retention policies, discussed in response to Question 14, records containing this type of information no longer exist. Nonetheless, the Nike Site reports, mentioned in response to Question 1, do provide limited information that is responsive to this question (TAB 5, Table II, TAB 4, Chapter 6).

**Response to Section 104(e), CERCLA, Questionnaire
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d. The beginning and end dates of the period(s) during which such hazardous substance was used, generated, purchased, stored, or otherwise handled;

Answer. See previous response.

e. The types and sizes of containers in which these substances were transported and stored; and

Answer. See previous response.

f. The persons or companies that supplied each such hazardous substance to your company.

Answer. See previous response.

5. Identify all by-products and wastes generated, stored, transported, treated, disposed of, released, or otherwise handled by your establishment(s) in the Philadelphia, Pennsylvania area between 1958 and 1976. With respect to each by-product and waste identified, further provide:

Answer. See response to question 4.

a. The process(es) in which each such by-product and waste was generated, stored, transported, treated, disposed of, released, or otherwise handled;

b. The chemical composition, characteristics, and physical state (solid, liquid, or gas) of each such by-product or waste;

c. The annual quantities of each such by-product and waste generated, stored, transported, treated, disposed of, released, or otherwise handled;

d. The types, sizes, and numbers of containers used to treat, store, or dispose of each such by-product or waste;

e. The name of the individual(s) and/or company(ies) that disposed of or treated each such by-product or waste; and

f. The location and method of treatment and/or disposal of each such by-product or waste.

**Response to Section 104(e), CERCLA, Questionnaire
Lower Darby Creek Superfund Site**

6. Did U.S. Army Reserve ever contract with, or make arrangements with Clearview, Folcroft, Folcroft Annex, Eastern Industrial, Tri-County Hauling, S. Buckley Trash Hauling, Barratt Rupurt, McCloskey Engineering, ABM Disposal Services, Marvin Jonas, Jonas Waste Removal, Paolino Company, Schiavo Bros., Inc., Gene Banta trash Hauling, and/or other company or municipality to remove or transport material from your establishment(s) in the Philadelphia, Pennsylvania area between 1958 and 1976 for disposal? If so, for each transaction identified above, please identify:

Answer.

Information obtained from the EPA indicates that the Army Reserves used Tri-County Hauling and another company, Magnum, in 1974 to remove and transport unidentified material to undisclosed locations. Specifically, the EPA has provided 14 documents to the Army Reserves that it discovered during its investigation into the site. (TAB 8) Nine of these documents appear to be Tri-County Hauling invoices for the removal of unidentified waste from the Reserve Center on Ford Road, Bristol, Pennsylvania between June and November 1974. Another four documents are handwritten notes for the removal of unidentified waste from an Army Reserve site. Only one of the handwritten notes is dated, June 1974. The final document is a printout from an adding machine showing dollar amounts, but no other information. Four of the Tri-County invoices and at least two of the handwritten notes identify another company, Magnum, without providing additional information about that company, its relationship to the Army Reserves, Tri-County Hauling or to the site. The EPA has been unable to provide further information about Magnum. None of the documents provided by the EPA identify where the waste from the Reserve Facility was ultimately disposed of.

The Army's records retention policy in effect during the relevant time frame required the destruction of contract files after 3 years if the value of the contract was less than \$2,500 or after 6 years if the value exceeded that amount. Despite that record retention policy, the Army searched⁴ a number of active, reserve and national guard facilities for responsive records. Unfortunately, we were unable to locate military records confirming that the Army Reserve contracted or made arrangements with the companies identified above or "Magnum" during the relevant time periods.

Despite the absence of contract records, anecdotal evidence indicates that Army activities occasionally contracted with private companies and/or municipalities to transport and/or dispose of solid waste and hazardous waste. Some of that waste may have been used by municipalities for dust suppression on roads or by private companies for commercial purposes (e.g., undercoating vehicles, recycling) or may have been disposed of at municipal landfills. These observations are based on (1) interviews of Army witnesses identified in response to Question 2; (2) a Management Improvement Program Report for the Third Quarter of 1956 from Fort Dix describing that post's reliance on indefinite quantity contracts with private vendors to sell/dispose of scrap metal and waste oil (TAB 9), (3) the Tri-County Hauling documents discovered by EPA during its investigation into this site (TAB 8), and (4) the Nike Site reports mentioned in response to Question 1 (TAB 5, p. 22; TAB 4, p. 6-4).

Because of the Army's records retention policy, we cannot identify how often Army reserve facilities contracted or made arrangements with private companies and municipalities to transport and/or dispose of wastes or identify the nature of that waste. Nonetheless, we believe the services of private companies and municipalities were used occasionally based on the

⁴ These search efforts are described in more detail in response to Question 14.

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following factors: (1) the practice of using spent POLs and solvents to control vegetation at reserve sites (TAB 5, p 37) (2) the practice of drumming waste for turn-in through Army supply channels (TAB 4, p 6-5, TAB 5, p 19) (3) the occasional practice of disposing of spent POLs and solvents on-site through sump drains or by pouring it on the ground (TAB 4, p 4-6, 6-5; TAB 5, 19); (4) the use of active duty installations and equipment concentration sites to perform maintenance on reserve vehicles and equipment.

a. The person with whom you made such a contract or arrangement;

Answer. See previous response.

b. The date(s) on which or time period during which such material was removed or transported for disposal;

Answer. See previous response.

c. The nature of such material, including the chemical content, characteristics, and physical state (i.e., liquid, solid, or gas);

Answer. See previous response. The records provided by the EPA indicate that the Army Reserves facility in Bristol, Pennsylvania, used Tri-County Hauling and perhaps a company named Magnum to remove unidentified waste between June and November 1974. Although not specified in those records, Army Reserve personnel believe this waste resulted from construction activities at the Bristol Reserve facility. In 1963, Nike Site PH-15 was closed and deactivated and a 15 acre parcel of land was transferred to the Army Reserves. In 1974, the following Nike Site facilities were demolished: enlisted barracks, officers' quarters, pump house, acid storage shed, acid fueling station, generator building, latrine and missile assembly and test building. Between 1974 and 1975, the new Reserve Center was built. Construction debris from these activities may have included small quantities of copper and/or lead piping, lead based paint, PCBs from generator switchboards, mercury from thermostats and asbestos containing materials (e.g., floor tiles, roofing shingles, pipe insulation).

d. The annual quantity (number of loads, gallons, drums) of such material;

Answer. See previous response.

e. The manner in which such material was containerized for shipment or disposal;

Answer. See previous response.

f. The location to which such material was transported for disposal;

Answer. See previous response.

g. The person(s) who selected the location to which such material was transported for disposal;

Answer. See previous response.

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h. The individuals employed with any transporter identified (including truck drivers, dispatchers, managers, etc.) with whom your establishment dealt concerning removal or transportation of such material; and

Answer. See previous response.

i. Any billing information and documents (invoices, trip tickets, manifests, etc.) in your possession regarding arrangements made to remove or transport such material.

Answer. See previous response.

7. Provide the names, titles, areas of responsibility, addresses, and telephone numbers of all persons who, between 1958 and 1976, may have:

Answer. Because of the Army's records retention policies, discussed in response to Question 14, we believe that the documents that would have identified Army Reserve individuals responsible for the activities specified below have been destroyed.

a. Disposed of or treated materials at Clearview, Folcroft and Folcroft Annex or other areas of the Site;

b. Arranged for the disposal or treatment of materials at Clearview, Folcroft, and Folcroft Annex or other areas of the Site; and/or

c. Arranged for the transportation of materials to the Clearview, Folcroft and Folcroft Annex or other areas of the Site, (either directly or through transshipment points) for disposal or treatment.

8. For every instance in which your establishment(s) disposed of or treated material at Clearview, Folcroft and Folcroft Annex or other areas of the Site, or arranged for the disposal or treatment of material at the Site, identify:

Answer. See response to Question 6.c.

a. The date(s) on which such material was disposed of or treated at the Site;

b. The nature of such material, including the chemical content, characteristics, and physical state (i.e., liquid, solid, or gas);

c. The annual quantity (number of loads, gallons, drums) of such material;

d. The specific location on the Site where such material was disposed of or treated; and

e. Any billing information and documents (invoices, trip tickets, manifests, etc.) in your company's or establishment's(s') possession regarding arrangements made to dispose of or treat such material at the Site.

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9. Did your establishment(s), or any other company or individual ever spill or cause a release of any chemicals, hazardous substances, and/or hazardous waste, and/or non-hazardous solid waste on any portion of Clearview, Folcroft, and Folcroft Annex or any other portion of the Site? If so, please identify the following:

Answer. The EPA has provided 14 documents indicating that the Army Reserves used Tri-County Hauling and perhaps another company, Magnum, to remove unidentified waste from the Reserve Center on Ford Road, Bristol, Pennsylvania between June and November 1974. The documents provided by the EPA do not identify where the waste from the Reserve Facility was ultimately disposed of. We have been unable to locate any military documents indicating that the Army Reserves spilled or caused a release of any of the identified substances on any portion of Clearview, Folcroft, and Folcroft Annex.

- a. The date(s) the spill(s)/release(s) occurred;**
- b. The composition (i.e., chemical analysis) of the materials which were spilled/released;**
- c. The response made by you on or your behalf with respect to the spill(s)/release(s); and**
- d. The packaging, transportation, and final disposition of the materials which were spilled/released.**

10. Please identify individuals employed by the U.S. Army Reserve who were responsible for arranging for the removal and disposal of wastes, and individuals who were responsible for payments, payment approvals, and record keeping concerning such waste removal transactions at your Philadelphia, Pennsylvania area establishment(s) between 1958 and 1976. Provide current or last known addresses and telephone numbers where they may be reached. If these individuals are the same person identified by your answer to question 3, so indicate.

Answer. Because of the Army's records retention policy, discussed in response to Question 14, documents that would have identified individuals responsible for the specified activities have been destroyed.

11. Did you or any other person or entity on your behalf ever conduct any environmental assessments or investigations relating to contamination at Clearview, Folcroft and Folcroft Annex or any other areas of the Site? If so, please provide all documents pertaining to such assessments or investigations.

Answer. Before 1984, the Army lacked authority to expend appropriated funds to investigate contamination on property it did not own (i.e., third party sites). The passage of the 1984 Defense Appropriation Act remedied this problem and gave the Army authority to investigate formerly used defense sites (FUDS) (i.e., Nike Sites). In addition to the FUDS program, the Army also gained authority under the Defense Environmental Restoration Program to use current year funds to conduct environmental assessments and/or site investigations at third party sites where it has been identified as a potentially responsible party. (TAB 5, p 4) During our investigation, we found no evidence that the Lower Darby Creek Area Superfund site qualifies as a FUDS or that the Army or any of its contractors conducted an environmental assessment or site investigation at Clearview, Folcroft or Folcroft Annex.

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12. If you have any information about other parties who may have information which may assist the EPA in its investigation of the Site, including Clearview, Folcroft and Folcroft Annex, or who may be responsible for the generation of, transportation to, or release of contamination at the Site, please provide such information. The information you provide in response to this request should include the party's name, address telephone number, type of business, and the reasons why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.

Answer. We are not aware of other parties who have information regarding these sites at this time.

13. Representatives of your establishment(s):

a. Identify the person(s) answering these questions on behalf of you establishment(s), including full name, mailing address, business telephone number, and relationship to the company.

Answer. Listed below are names of current or former Army personnel who provided information responding to the questions or who drafted the responses to these questions.

U.S. Army Reserves

1. LTC Donald Taylor, Deputy Staff Judge Advocate, 99th Reserve Support Command, ATTN: AFRC-CPA-JA, 99 Soldier's Lane, Coriapolis, PA 15108-2550. (412) 604-8255.
Donald.Taylor2@usarc-emh2.army.mil
2. Bruce Kish, Environmental Protection Specialist, 99th Reserve Support Command, ATTN: AFRC-CPA-EN-E, 99 Soldier's Lane, Coriapolis, PA 15108-2550 (412) 604-8169.
Bruce.Kish@usarc-emh2.army.mil
3. Kendra L. Borka, Environmental Protection Specialist, GS-0028-11, 99th Regional Support Command, Region Office 2, Bldg. 176, NAS Willow Grove, PA 19090. (215) 443-1643/1667
kendra.borka@usarc-emh2.army.mil
4. Walter S. Wisner, Retired, Facility Management Supervisor, 61 Carriage Drive, Doylestown, PA 18901 (215) 345-4341 wwisner@comcast.net
5. Francis E. Huff, AMSA#23 Supervisor, AMSA#23, BLDG. 178, NAS Willow Grove, PA 19090 (215) 443-1654 Huffe@usarc-emh2.arm.mil
6. Raymond Bevan, ECS Supervisor, ECS #24, Bldg. 10-83, Fort Indiantown Gap, Annville, PA 17003-5015 (717) 861-2165 Raymond.Bevan@usarc-emh2.army.mil
7. Thomas Lynch, SSA ,338th Medical Group, James W. Reese USARC, 500 W. 24th Street (Upland), Chester, PA 19013-4999 (610) 872-0311 Thomas.Lynch@usarc-emh2.army.mil
8. Nicholas M. Taylor, Facility Management Specialist, North Penn Memorial USARC, 1625 Berks Road, Norristown, PA 19403-4815 1-800-419-5824 ext. 225 nicholas.taylor@usarc-emh2.army.mil

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9. Bruce Noble, DRMS Achieves Manager, Defense Reutilization and Marketing Service, 74 N. Washington Ave, Battle Creek, MI 49017-3092 (616) 961-7412 Bnoble@drms.dla.mil
10. Robert Panbianco, DRMO Lakehurst, Naval Air Engineering Bldg. 75, Lawrence & Severyns Road, Lakehurst, NJ 08733-5010 (732) 2023/7373
11. Stanley D. Bauer, SME NIKE Sites, US Army Corps of Engineers, HTRW Center of Expertise, CENWO-HX-S9 Stan Bauer), 12565 West Center Road, Omaha, NE 68144-3869 (402) 697-2619 stanley.d.bauer@usace.army.mil
12. Michael Ney, PA Department of Military & Veterans Affairs, Fort Indiantown Gap, Annville, PA 17003-5002 (717) 861-9672
13. Ken Malick, Dunham Army Clinic, ATTN: Environmental Health, Carlisle Barracks, PA 17013-5003 (717) 245-3902
14. William Staub, CXO, 99th Regional Support Command, 99 Soldier Lane. Moon Township. PA 15108 (412) 604--8002 william.staub@usarc-emh2.armt.mil
15. Cal Bowser, DCSLOG, 99th Regional Support Command, 99 Soldier Lane, Moon Township, PA 15108 (412) 604-8377 Cal. Bowser@usarc-emh2.army.mil
16. Bonaparte Miller, Retired Former Supervisor, AMSA#31, Edgemont, PA (610) 532-3025.

Corps of Engineers.

17. Robert J. Williams, ATTN: CENAB-PP-E, Baltimore District, Corps of Engineers, P.O. Box 1715, Baltimore, MD 21203. (410) 962-4006. (Point of Contact for Formerly Used Defense Sites in Pennsylvania)
18. Gregory Goepfert, ATTN: CENAN-PP-E, New York District, Corps of Engineers, Jacob K. Javits Federal Building, New York, NY 10278 (212)264-5581. (Point of Contact for Formerly Used Defense Sites in New Jersey).

b. Provide the name, title, current address, and telephone number of the individual representing your establishment(s) to whom future correspondence or telephone calls should be directed.

Answer. Correspondence and calls regarding this questionnaire should be directed to the following addressee:

COL Del Fougner, Chief Engineer, Office of the Chief Army Reserves, DAAR-EN, 1421 Jefferson Davis Highway, Suite 11200, Arlington, VA 22202 (703) 601-3405.
Del.Fougner@ocar.army.pentagon.mil

LTC David Harney, Environmental Attorney, Environmental Law Division, U.S. Army Legal Services Agency, 901 North Stuart Street, Suite 400, Arlington, VA 22203 (703) 696-1596. harneydp@hqda.army.mil.

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14. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If the records were destroyed, provide us with the following:

a. Your document retention policy.

Answer.

a. **Document Retention Policy.** As noted in response to Question 1, the Army established an area support program under which designated installations provided services necessary to support military units and activities in specified geographic regions. Under that program, Fort Indiantown Gap and Fort Dix provided a variety of logistics services to Pennsylvania and New Jersey reserve units, respectively. As a result, these installations were required to create, maintain and dispose of records associated with those particular support activities under the Army's records management policy, "The Army's Functional Files System (TAFFS)" (TAB 10, paragraph 1.b; TAB 11, paragraph 1.b; TAB 12).⁵ The Army also established a records management policy, the "Unit Functional Files System", for all Reserve units and activities as well. (TAB 13, paragraphs 2.b & c)⁶ The Unit Functional Files System (UFFS) complemented the TAFFS, but imposed streamlined records management obligations on units using that system. (TAB 13).⁷ Both records managements systems maintained records according to major functional areas.

b. Prior to August 1969, the only records archived under TAFFS⁸ and UFFS⁹ were those with a retention period longer than 6 years or otherwise identified as a "permanent" record. In August 1969, the Army adopted new disposition standards for TAFFS by rescinding AR 345-210 with the 340-18 series of regulations (TABs 10 & 11) which only archived records identified as "permanent". When new disposition standards reduced the retention period for records, Army commands were required to apply those new standards retroactively unless it was impractical or uneconomical to do so. (TAB 12, para. 53.b).

c. Summarized below are the major functional areas, subcategories and disposition instructions for records which may have contained relevant information. Records in the Individual Procurement Transaction Files (Category 1403), the Supplies Disposition Files (Category 1434), Real Property General Maintenance Files (Category 1508), and Environmental Pollution Files beginning in September 1974, are the most relevant to this request for information because they tend to show how the Army Reserves disposed of waste material. The remaining categories are relevant because they tend to depict waste generating activities.

⁵ TAB 10 (AR 340-18-14, *Maintenance and Disposition of Logistics Functional Files*, 14 Aug 1969); TAB 11 (AR 340-18-15, *Maintenance and Disposition of Facilities Functional Files*, 14 Aug 1969). Before August 1969, the Army records management policy for most units and activities was consolidated in AR 345-210, *Records Management File Systems and Standards*, 31 Oct 1962 (TAB 12).

⁶ TAB 13 (AR 345-215, *Records Management – TOE Units of the Active Army and the Army Reserve*, 1 Nov 1962, paragraph 2.b & c).

⁷ TAB 13. AR 345-215, paragraphs 1 ("These regulations are designed to simplify the administration of records in certain" units.); 5.b (noting that the Unit Functional Files System simplifies the TAFF "because units governed by these regulations normally do not create files in these functional areas.").

⁸ TAB 12 (AR 345-210, para 57f(2)).

⁹ TAB 13 (AR 345-215, para 29(1) – (8)).

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AR 340-18-14, Maintenance and Disposition of Logistics Functional Files, 14 August 1969.
(Applicable to Department of the Army, except Army Reserve elements.)(TAB 10)

1403 Individual Procurement Transaction Files		
File No.	Description	Disposition
1403-01	Transactions for \$2,500 or less.	Destroy after 3 years.
1403-03	Transactions for more than \$2,500.	Destroy 6 years after final payment.
1403-05	Master, open-end and call-type contract files.	Offices administering contract: Destroy 6 years after expiration and final payment. Offices procuring under contract: dispose based on values established above.
1420 Maintenance Files		
File No.	Description	Disposition
1420-17	Preventive maintenance schedule files.	Destroy after transferring the required information to other records or on disposition of related equipment, whichever occurs first.
1420-18	Equipment inspection and maintenance worksheet files.	Destroy on posting to related equipment log book, on entering deficiencies on a new form or on completion of next serviceability test.
1431 Petroleum and Solid Fuel Supply Files		
File No.	Description	Disposition
1431-02	Gasoline and lubricant issue files.	Destroy after 1 year
1431-04	Solid fuel control files	Creating Offices: File in and dispose with the appropriate related procurement file.
1434 Supplies Disposition Files		
File No.	Description	Disposition
1434-06	Sales contract files.	Destroy 3 years after close of FY in which final payment is made.
1434-08	Retail sale files.	Same.

AR 340-18-15, Maintenance and Disposition of Facilities Functional Files, 14 August 1969.
(Applicable to Department of the Army, except Army Reserve elements.)(TAB 11)

1508 Real Property General Maintenance Files		
File No.	Description	Disposition
1508-06	Sanitary service files.	Other offices: Destroy when superseded, obsolete, or no longer required for reference whichever is first.
1508-07	Custodial service files.	Same.
1512 Water and Air Pollution Files (effective 14 August 1969)¹⁰		
Does not Contain File Categories Relevant to Solid/Hazardous Waste		
1512 Environmental Pollution Files (effective 12 September 1974)		
1512-01	Environmental pollution abatement files.	Other offices: Destroy when superseded, obsolete, or no longer required for reference whichever is first.
1512-02	Environmental pollution complaint files.	Destroy 10 years after close of case.

¹⁰ Research indicates the Army did not begin maintaining environmental records until October 1966 when the Army amended AR 345-210 and incorporated functional categories 1503-31.1 – 1503-31.4 which addressed air and water pollution complaint and abatement records. Like the 1969 versions, these earlier categories did not contain information relevant to the management of solid or hazardous waste. (TAB 12).

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AR 345-215, Records Management TOE Units of Active Army and Army Reserve, 1 Nov 1962
(Applicable to all Army Reserve units and activities)(TAB 12)

15 Supply Files		
File No.	Description	Disposition
14-28	Gasoline and lubricants issue	Destroy after 1 Year.
14-36	Equipment inspection and maintenance work sheet files	On posting of related equipment log book, or on entering deficiencies of a new form as applicable.
14-43	Lubrication record files	1 year after final entry on the form.

d. **Document Searches.** Despite the record retention policies described above, Reserve and National Guard personnel in Pennsylvania and New Jersey searched for records that were responsive to this request for information. Those efforts included searching for records at Fort Indiantown Gap, Fort Dix, the Defense Reutilization Marketing Service archives, and at the eight active reserve facilities that were also active when the Lower Darby Creek Area landfills were operational. To date, those searches have not turned up any responsive records. In addition, the Army's Environmental Law Division, which represents the Army in environmental litigation and administrative proceedings, has conducted similar record searches in association with the Combe Fill South Landfill Site, a municipal landfill that operated in Chester, New Jersey, from 1940 to 1983. Searches for records (showing that the Army and/or Army Reserves units shipped waste to the Combe site) at Fort Dix, New Jersey, the 79th Army Reserve Command (ARCOM), Willow Grove, Pennsylvania, (a predecessor to the 99th Reserve Support Command), and at the Suitland and St. Louis Federal Records Centers were unsuccessful.

e. As a final quality control measure, we are coordinating with the Corps of Engineers in New York and the 77th Regional Support Command (and its predecessor the 77th ARCOM, Fort Totten, Flushing, NJ), to determine whether any of those locations has any relevant information. We have also have begun reviewing consolidated index reports from the federal records center at Suitland, Maryland and St. Louis, Missouri. When those document search efforts are complete, we will provide those responses to your office.

b. A description of how the records were/are destroyed (burned, archived, trashed, etc.) and the approximate date of destruction.

Answer. Records authorized for destruction under TAFS and UFFS were destroyed or sold as waste paper provided the content of those records was destroyed beforehand. TAB 12, para. 55.b)

c. A description of information that would have been contained in the documents; and

Answer. See the general description of the records in TABs 10 – 13.

d. The name, job title, and most current address known to you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; and the person(s) who would have been responsible for the destruction of these documents.

Answer. Because of the records retention policy described above, documents containing this information is no longer available.

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**APPENDIX 1
FACILITY LIST**

TABLE 1: USAR and Nike Facilities Active from 1958 to 1976.

FACILITY	COUNTY	STATUS	CURRENT UNITS/ACTIVITIES	PAST (1958-1976) UNITS/ACTIVITIES
Bristol USARC 2501 Ford Rd. Bristol, PA	Bucks	Active	Units: 365 th Military Intelligence Co, 413 th Postal Detachment (Det); 465 th Transportation Co - deployed to Fort Bragg, NC for 2 yrs. Activity: Administrative ¹¹ ; OMS ¹² .	<ul style="list-style-type: none"> • Jul 1954-Feb 60: Army acquired 23 acres from private landowners. • 1956-1963: Active Nike Site (#PH-15). • Nov 1963: 15 acre launch parcel reassigned to USAR which builds USARC on that parcel circa 1974-75. Old Nike buildings demolished. • Jun 1964: 8 acre control parcel reassigned to USAR for administrative purposes. Vacated and reported excess to GSA in Jul 1976. • 1980s-1990s: Co A, 1-315th Infantry Reg't; 3-42nd Field Artillery (FA) Bn; HQ, HQ Battery, 3-42nd FA.
Edgemont USARC/AMSA 2101 Delchester Rd. Edgemont, PA	Delaware	Active	Units: 424 th Medical Battalion Activities: Administrative, OMS; AMSA ¹³ .	<ul style="list-style-type: none"> • 1954-60: Army acquired 108 acres from private landowners. • 1954-69: Active Nike Site (#PH-75/78 (Media)) (1955-1968) Huntsville. • Mar 1964: GSA conveys 3 acres to landowner. • Dec 1969: 105 acres reassigned to USAR. • Jun 1970-Feb 77: USAR declares 65 acres excess & retains 43 acres for USARC. • 1973-78: GSA transfers 65 acres to private and municipal landowners. • 1980s-early 1990s: 157th Spt Bn (HHD, Co B, Co C, Co D); 223rd Trans Co.

¹¹ Administrative functions include routine office support functions.

¹² OMS is an abbreviation for "Organizational Maintenance Site." An OMS is a two-bay work shop located at some Reserve facilities that is used by units for minor maintenance and repairs of administrative vehicles and equipment.

¹³ AMSA is an abbreviation for "Area Maintenance Support Activity." AMSAs are larger maintenance shops consisting of three or more workbays and staffs of 20 or more personnel. AMSAs were created in the 1970s to replace Area Organizational Maintenance Sites. AMSAs service specific regions within a Reserve command and may provide specialized maintenance (e.g. watercraft maintenance). AMSAs performed a greater degree of maintenance such as engine repair and may operate "sub shops" at certain Reserve facilities which perform minor maintenance checks and services.

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FACILITY	COUNTY	STATUS	CURRENT UNITS/ACTIVITIES	PAST (1958-1976) UNITS/ACTIVITIES
Germantown USARC 5200 Wissahickon Ave Philadelphia, PA	Philadelphia	Active	Unit: 233 rd Quartermaster Co; Recruiting Station Activities: Admin; OMS	1940-55: Army acquired land from Philadelphia. 1955-56: USAR Center built. Early 1990s: Co. B, 1-315 th Inf; Co C, 1-315 th Inf.
Horsham 01 USARC 936 Easton Rd Horsham, PA	Montgomery	Active	Units: 367 MP Co, HHC, 244 th AVN Bn; AMSA #23 subshop. Activities: Admin., Maintenance	Jul 1953: Army acquired land from Lippincott heirs. 157 th Inf Bde; Co A, 157 th Spt Bn; 390 th CM Det
James Reese USARC 500 W 24th St. Chester, PA	Delaware	Active	Units: 338 th Medical Group, 858 th Med. Det. (Dental), 817 th Replacement Battalion (Personnel) Activity: Administrative; OMS.	<ul style="list-style-type: none"> • Aug 1957: Army acquired land from Wildman/Coopersmith. • 1957-58: USARC built. • 1980s-1990s: 817th P&A Bn; 324th Med Co; 402nd Med Det; 458th Den Det; 456th Den Det
Marcus Hook USARC 7 West Delaware Ave Marcus Hook, PA	Delaware	Inactive	NOT APPLICABLE	1956-1973: USPHS Quarantine Station 1973-1999: USAR 949 th Trans Co (Watercraft). 2001 Transferred to Marcus Hook
Musselman USARC 1020 Sandy Hill Norristown, PA	Montgomery	Active	Units: 358 th Civil Affairs Brigade: 416 th Civil Affairs Bn. 401 st QM Bn (Petro Prod) Activities: Administrative; OMS	<ul style="list-style-type: none"> • Sep 1955: Army acquired land from Steinbach. • 1955-56: USAR Center built. • 401st QM Bn (Petro Prod); 127th Mob Des Det (R & D)
North Penn USARC 1625 Berks Rd. Norristown, PA	Montgomery	Active	Units: 307 th Band, 153 rd Legal Spt. Organization; 369 th Fire Fighter Det., 223 rd Truck Co (POL) Activities: Administrative, OMS	<ul style="list-style-type: none"> • 1954-55, 60: Army acquired 31 acres from private business. • 1954-68: Former Nike Site (#PH 91) (1956-63). • Jul 1968: Reassigned to USAR. • Apr 1973: USAR reports 12 acres excess. • 1975: GSA transfers 12 acres to municipalities.
Philadelphia AFRC 2828 Woodhaven Rd. Philadelphia, PA	Delaware	Active	Units: Joint Facility shared with U.S. Marine Corps and Army Civil Affairs Brigade. Activity: Admin., Maintenance	<ul style="list-style-type: none"> • Apr 1963: Army acquired land from Philadelphia. • 1963-64: USAR Center built. • 304th CA Gp; 224th MI Co; 122nd Mob Des Det; 2072nd USARF School; Co C, 330th EN Bn; Det 1, 442nd Fld Svc Co (Laundry)
Nike Site PH 07 Richboro/Northampton Township, PA	Bucks	Inactive	NOT APPLICABLE	<ul style="list-style-type: none"> • Jun 1954-Dec 58: Army acquired land. • 1956-61: Active Nike Site. (1954-68 Huntsville) • Aug 1964: All land reported excess to GSA • Jun 1967-Jun 68: GSA transfers land to private & municipal owners & retains control of 54 acre perpetual easement.

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FACILITY	COUNTY	STATUS	CURRENT UNITS/ACTIVITIES	PAST (1958-1976) UNITS/ACTIVITIES
Nike Site PH 67 Chester, PA	Bucks	Inactive	NOT APPLICABLE	<ul style="list-style-type: none"> • 1954 & 59: Army acquired land. • 1954-64: Active Nike Site. (1955-63 Huntsville). • Dec 1964: Reported excess to GSA. • Nov 1965: Conveyed to school district.
Nike Site PH 82 Schuylkill Haven, PA	Schuylkill	Inactive	NOT APPLICABLE	<ul style="list-style-type: none"> • 1955-70's: Active Nike Site. • Transferred to University of PA, Valley Forge Research Center.
Nike Site PH 97/99 Lansdale/Warrington PA	Bucks	Inactive	NOT APPLICABLE	<ul style="list-style-type: none"> • 1954-60: Army acquired 40 acres • 1954-70: Active Nike Site (1956-1971). • Jan 1970: 25 acres reassigned to USAR. • Aug 1977: entire parcel declared excess. • Dec 1978: GSA transfers parcel to municipality.
Nike Site PH 25 Newbolds Corner Road Eayrestown Road Lumberton, NJ		Inactive	NOT APPLICABLE	<ul style="list-style-type: none"> • Mid-1950s: Army acquired 36+ acres in fee simple and 75+ acres in easements. • 1958-62: Active Nike Site. • Dec 1963: 4+ acres sold to private individual. • Oct 1974: Balance reported excess to GSA. • Apr/May 1976: fee acreage conveyed to Lumberton.
Nike Site PH 41/43 Williamstown Road Cross Keys Road Gloucester Township New Jersey	Berlin	Inactive	NOT APPLICABLE	<ul style="list-style-type: none"> • Mid-1950s: Army acquired 138 acres. • 1956-1974: Active Nike Site. • Post 1974: Land Reported excess to GSA and maintained by GSA as of 18 June 2001.
Nike Site PH 58 Route 322 Swedesboro, NJ	Gloucester	Inactive	NOT APPLICABLE	<ul style="list-style-type: none"> • May 1955-Nov 1959: Army acquired 35+ acres in fee simple and 36 acres in easements. • 1957-1966: Active Nike Site. • Sep 1974: fee acres and 3+ acres easements reported excess to GSA. • Aug 1976: GSA transfers above parcels to Swedesboro-Woolwich Board of Education • Jul 1979: GSA assumes care for balance of easement acres. • Jun 1983: transferred parcels revert back to GSA.

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TABLE 2: USAR or Nike Facilities currently active in Philadelphia, Pennsylvania Area.

FACILITY	COUNTY	STATUS	CURRENT UNITS/ACTIVITIES	PAST (1958-1976) UNITS/ACTIVITIES
MG Wurts Bldg 176 NAS Willow Grove, PA	Montgomery	Active	Units: 656th Area Support Group 1215th Garrison Support Unit Activity: Admin	NOT APPLICABLE USAR Center constructed 1977
AMSA #23 Bldg 178 NAS ¹⁴ Willow Grove, PA	Montgomery	Active	Units: AMSA #23. Activity: AMSA	NOT APPLICABLE USAR Facility constructed 1977
Air Staging Facility #28 Bldg 177 NAS Willow Grove, PA	Montgomery	Active	Units: HQs, 79th ARCOM; Aviation Brigade, 79 th ARCOM Activity: Administrative, aviation maintenance	NOT APPLICABLE USAR Facility constructed 1977

TABLE 3: Inactive USAR and Nike Facilities in Philadelphia, Pennsylvania area.

Downingtown USARC Boot Road Downingtown, PA	Chester	Inactive	Unit: None. Activity: NOT APPLICABLE. Property used late 1980s-1992/4.	NOT APPLICABLE
Folsom AFRC ¹⁵ 6th Kenron Ave Folsom, PA	Delaware	Inactive	Units: None. Activity: NOT APPLICABLE. USAR used facility from 1980s to 1995.	NOT APPLICABLE
Horsham 02 USARC 400 Horsham Road Horsham, PA	Montgomery	Inactive	Units: None. Activity: NOT APPLICABLE. Property used from late 1980s-1996.	NOT APPLICABLE
Horsham USARC 420 Babylon Rd. Horsham, PA	Montgomery	Inactive	Units: None. Activity: NOT APPLICABLE. Property used for administrative purposes early 1990s-1996.	NOT APPLICABLE
N.E. Phila. USARC 1522 East Wingohocking St Phila, PA	Philadelphia	Inactive	Units: None. Activities: NOT APPLICABLE. Property used for administrative purposes 1980s-1990s.	NOT APPLICABLE

¹⁴ NAS is an abbreviation for Naval Air Station.

¹⁵ AFRC is an abbreviation for Armed Forces Reserve Center. Although the Army Reserve has vacated the Folsom AFRC, that facility is still used by other branches of the Armed Forces (e.g., Naval Reserves).

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Quakertown USARC Route 663 Quakertown, PA	Bucks	Inactive	Units: None Activity: NOT APPLICABLE. Property used for administrative purposes 1980s-1990s.	NOT APPLICABLE
Tacony Warehouse 5100 Princeton Ave Philadelphia, PA	Philadelphia	Inactive	Units: None. Activity: NOT APPLICABLE. Property used for equipment storage 1980s-1990s.	NOT APPLICABLE
Willow Grove USARC Woodlawn Ave Willow Grove, PA	Montgomery	Inactive	Units: None. Activity: NOT APPLICABLE. Property used for administrative purposes 1980s-1995.	NOT APPLICABLE

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